

PAWAR LAW GROUP, P.C.

Vik Pawar

20 Vesey Street, Suite 1410

New York, NY 10007

Telephone: (212) 571-0805

Facsimile: (212) 571-0938

Email: vik@pawarlaw.com

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TRENT NICHOLS and SHARON
NICHOLS, derivatively on behalf of
COCRYSTAL PHARMA, INC. F/K/A
BIOZONE PHARMACEUTICALS, INC.,

Plaintiffs,

vs.

ELLIOTT MAZA, GARY WILCOX,
JEFFREY MECKLER, GERALD
MCGUIRE, JAMES MARTIN, CURTIS
DALE, RAYMOND SCHINAZI, DAVID
BLOCK, PHILLIP FROST, JANE H.
HSIAO, STEVEN RUBIN, BRIAN
KELLER, BARRY C. HONIG, JOHN
STETSON, MICHAEL BRAUSER, JOHN
O'ROURKE III, MARK GROUSSMAN,
and JOHN H. FORD,

Defendants,

and

COCRYSTAL PHARMA, INC. F/K/A
BIOZONE PHARMACEUTICALS, INC.,

Nominal Defendant.

Case No.: 2:19-cv-16751-KM-JBC

**PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF
SETTLEMENT**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Timothy Brown in Support of Plaintiffs' Motion for Final Approval of Settlement dated November 25, 2020, the exhibits attached thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings, Plaintiffs in the above-captioned consolidated shareholder derivative action, derivatively on behalf of Cocystal Pharma, Inc., hereby move this Court, at the United States District Court for the District of New Jersey, before the Honorable Kevin McNulty, Courtroom PO 04, located at the Martin Luther King Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey 07102, on November 25, 2020 or as soon thereafter as counsel can be heard, for an Order: (1) granting final approval of the proposed Settlement;¹ (2) entering the Judgment and dismissing all claims; (3) awarding the agreed-upon negotiated attorneys' fees and reimbursement of expenses to Plaintiffs' Counsel; (4) awarding the Service Awards to the Plaintiffs; and (5) granting such other relief as the Court deems just and proper.

In support of this motion, Plaintiffs rely upon the accompanying Memorandum of Law in Support; the Stipulation and the exhibits thereto; the declarations of Timothy Brown, Gregory Nespole, David Katz, and Scott Holleman

¹ Unless otherwise defined herein, all defined terms shall have the meanings as set forth in the Stipulation, which was filed with the Court on September 4, 2020 as Dkt. No. 24-1, and which is now attached as Exhibit 1 to the Declaration of Timothy Brown in Support of Plaintiffs' Motion for Final Approval of Settlement filed concurrently herewith.

made in support of this motion; and the proposed Final Order and Judgment submitted concurrently herewith; as well as all prior pleadings and proceedings in this action; and any other matter that the Court may consider at the hearing of this motion.

Dated: November 25, 2020

Respectfully submitted,

PAWAR LAW GROUP, P.C.

/s/ Vik Pawar

Vik Pawar

20 Vesey Street, Suite 1410

New York, NY 10007

Telephone: (212) 571-0805

Facsimile: (212) 571-0938

THE BROWN LAW FIRM, P.C.

Timothy Brown (*pro hac vice*
pending)

240 Townsend Square

Oyster Bay, NY 11771

Telephone: (516) 922-5427

Facsimile: (516) 344-6204

E-mail: tbrown@thebrownlawfirm.net

*Counsel for Plaintiffs Trent Nichols
and Sharon Nichols*

CERTIFICATE OF SERVICE

I hereby certify that, on November 25, 2020, I caused a true and correct copy of the foregoing document to be served on counsel of record by electronically filing it with the Clerk of the Court using the ECF system, which will send notification of such filing to the registered participants and via email to counsel for Defendants.

s/ Vik Pawar
Vik Pawar